

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ANTHONY ZARA,

Plaintiff,

v.

DEVRY EDUCATION GROUP, INC.;
DEVRY MEDICAL INTERNATIONAL,
INC.; ROSS UNIVERSITY SCHOOL OF
MEDICINE, SCHOOL OF VETERINARY
MEDICINE (ST. KITTS) LIMITED; and; and
ALEXA FERRARI;

Defendants.

Civil Action No. 1:16-cv-5156

PLAINTIFF’S MOTION FOR LEAVE TO FILE A THIRD AMENDED COMPLAINT

NOW COMES Plaintiff, ANTHONY ZARA (“Zara” or “Plaintiff”), by and through his undersigned attorneys, and hereby moves this Honorable Court, pursuant to Federal Rule of Civil Procedure 15(a)(2), for leave to file a Third Amended Complaint in the above-captioned cause. In support of his Motion, Plaintiff states as follows:

1. On May 11, 2016, Plaintiff filed his original Complaint in the above-captioned cause.
2. On May 13, 2016, Plaintiff filed his First Amended Complaint in the above-captioned cause.
3. On May 27, 2016, based upon corporate structuring information received from counsel for DeVry and RUSVM, Plaintiff filed his Second Amended Complaint in the above-captioned cause.

4. Federal Rule of Civil Procedure 15(a)(2) provides that, “a party may amend its pleading [with] the court’s leave” and that “[t]he court should freely give leave when justice so requires.”

5. During the course of opposing Defendants motions to dismiss, Plaintiff has recently discovered that Defendants corporate structure is not as previously believed, and that Ross University School of Veterinary Medicine is one and the same as Defendant DeVry Education Group Inc.

6. Accordingly, Plaintiff respectfully requests that this Court grant him leave to amend his allegations to be consistent with the fact that Ross University School of Veterinary Medicine is one and the same as Defendant DeVry Education Group Inc.

7. The proposed Third Amended Complaint is attached hereto as Exhibit 1.

WHEREFORE, Plaintiff ANTHONY ZARA, respectfully requests that this Honorable Court grant his leave to file the Third Amended Complaint that is attached hereto as Exhibit 1 in the above-captioned cause.

Respectfully submitted,

/s/ Jason J. Bach
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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 22, 2016, I caused the foregoing to be electronically filed with the Clerk of the Court via the Court's CM/ECF system, which will send electronic notification of such filing to:

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